

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On its Own Motion

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

01-0485

ORIGINAL
ILLINOIS
COMMERCE COMMISSION

MAR 28 10 28 AM '02

CHIEF CLERK'S OFFICE

Revision of Ill. Adm. Code Part 732

**THE CITY OF CHICAGO, PEOPLE OF THE STATE OF ILLINOIS,
AND CITIZENS UTILITY BOARD (COLLECTIVELY KNOWN AS GCI)
MOTION TO FILE *INSTANTER* THEIR BRIEF FOR PROPOSED PART 732**

The City of Chicago (City), by its attorney, Mara S. Georges, Corporation Counsel, the People of the State of Illinois by James E. Ryan, Attorney General, (AG), and Citizens Utility Board (CUB), known as Government and Consumer Intervenors (GCI), by their attorneys, submit this Motion to File *Instanter* their brief in the above-entitled matter.

1. GCI has prepared a brief in the above-referenced matter. The brief was prepared and ready to file on March 26, 2002.

2. Assistant Corporation Counsel Karen M. Coppa delivered a copy of the City's brief to the Federal Express office located on Madison Street in Chicago on March 26, 2002. The brief was to be delivered to Donna M. Caton, Chief Clerk, Illinois Commerce Commission, 527 East Capitol Ave., Springfield, Illinois by 10:00 A.M. on March 27, 2002. A copy of the federal express shipping slip is attached hereto.

3. On March 27, 2002, Attorney Coppa learned that Federal Express did not make the scheduled delivery due to an accounting mix-up.

4. Immediate arrangements were made to re-send the brief, along with this Motion to File *Instanter*.

5. A copy of GCI's brief was e-mailed to all parties of record on March 26, 2002. Therefore, none of the parties will be prejudiced by this late filing.

WHEREFORE, Government and Consumer Intervenors respectfully request that the Commission grant their Motion to File *Instanter* their Brief.

THE CITY OF CHICAGO

Mara S. Georges
Corporation Counsel

By: 

Karen M. Coppa
Assistant Corporation Counsel
Regulatory and Aviation Litigation Div.
30 N. LaSalle St., Suite 900
Chicago, Illinois 60602
(312) 744-4779
kcoppa@cityofchicago.org

THE PEOPLE OF THE STATE OF ILLINOIS

James E. Ryan, Attorney General

By: 

Susan L. Satter
Assistant Attorney General
Public Utilities Bureau
100 Randolph St., 11th Floor
Chicago, Illinois 60601
(312) 814-1104
Ssatter@atg.state.il.us

CITIZENS UTILITY BOARD

One of its Attorneys

By: 

Robert J. Kelter
208 S. LaSalle Street
Suite 1760
Chicago, Illinois 60604
(312) 263-4282
rkelter@cuboard.org

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

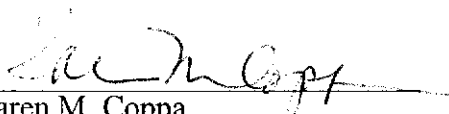
Illinois Commerce Commission
On its Own Motion

01-0485

Revision of Ill. Adm. Code Part 732

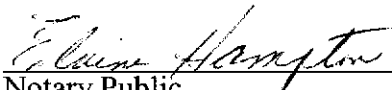
**VERIFICATION FOR
THE CITY OF CHICAGO, PEOPLE OF THE STATE OF ILLINOIS,
AND CITIZENS UTILITY BOARD (COLLECTIVELY KNOWN AS GCI)
MOTION TO FILE *INSTANTER* THEIR BRIEF FOR PROPOSED PART 732**

I, Karen M. Coppa., being duly sworn, state that I have read the Governmental and Consumer Parties' Motion to File their Brief *Instanter* in Illinois Commerce Commission Docket 01-0485 and that the contents therein are true and accurate to the best of my belief and knowledge.

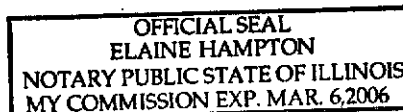


Karen M. Coppa
Assistant Corporation Counsel
Regulatory and Aviation Litigation Div.
30 N. LaSalle St., Suite 900
Chicago, Illinois 60602
(312) 744-4779
kcoppa@cityofchicago.org

SUBSCRIBED AND SWORN to before me, a Notary Public, on this 27th Day of March,
2002.



Notary Public



**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission
On its Own Motion

01-0485

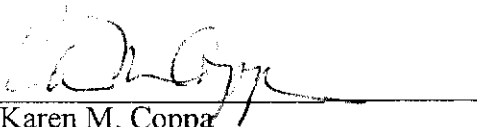
Revision of Ill. Adm. Code Part 732

CERTIFICATE OF SERVICE

TO: SEE ATTACHED SERVICE LIST

Please take notice that on this date I caused to be sent to Donna M. Caton, Chief Clerk, Illinois Commerce Commission, 527 East Capitol Avenue, P.O. Box 19280, Springfield, Illinois 62794-9280, by Federal Express, GCI's Motion to File their Brief Instantly.

DATED: March 27, 2002


Karen M. Coppa
Assistant Corporation Counsel
City of Chicago Department of Law
Suite 900
30 North LaSalle Street
Chicago, Illinois 60602
(312) 744-4779
kcoppa@cityofchicago.org